

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 7
)	
ALLHERE EDUCATION, INC.,)	Case No. 24-11841 (LSS)
)	
Debtor.)	

**CERTIFICATION OF COUNSEL REGARDING ORDER
PURSUANT TO RULE 502(d) OF THE FEDERAL RULES OF EVIDENCE**

I, Ricardo Palacio, counsel to George L. Miller, solely as the chapter 7 trustee (the “Trustee”) of AllHere Education, Inc. (the “Debtor”) and its estate, hereby certify as follows:

1. On August 23, 2024 (the “Petition Date”), the Debtor filed a voluntary petition under chapter 7 of the Bankruptcy Code commencing this chapter 7 case (the “Case”).

2. On September 4, 2024, the United States Attorney’s Office for the Southern District of New York (the “DOJ”, and together with the Trustee, the “Parties”) served upon the Trustee a certain Grand Jury Subpoena seeking certain information and documents (the “Documents”).

3. To preserve potentially privileged or protected information and documents, the Trustee and DOJ consent to the entry of the 502(d) Order in the form attached hereto as **Exhibit A** (the “Proposed Order”). The Parties agree to this path in lieu of motion practice under Fed. R. Bankr. P. 2004. *See* Del. Bankr. L.R. 2004-1(c)(i) (“A motion under Fed. R. Bankr. P. 2004 is not required if the proposed examinee agrees to voluntarily appear or produce documents”).

4. Accordingly, the Parties respectfully request entry of the 502(d) Order at the Court’s earliest convenience. In accordance with the Court’s electronic order processing procedures, the Proposed Order shall be uploaded to CM/ECF.

WHEREFORE, the Parties request that the Court enter the Proposed Order, substantially in the form attached hereto as **Exhibit A**, at its earliest convenience.

Dated: September 25, 2024

ASHBY & GEDDES, P.A.

/s/ Ricardo Palacio

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*(Proposed) Counsel to George L. Miller,
Chapter 7 Trustee to AllHere Education, Inc.*